

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
 : **Case No.: 20-14495**  
**Andrew R Gross** : **Chapter 13**  
 : **Judge Magdeline D. Coleman**  
**Debtor(s)** : **\*\*\*\*\***

**OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION OF THE PLAN**  
**(DOCKET NUMBER 2)**

Wells Fargo Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Andrew R Gross ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 325 Peachtree Dr., Jenkintown, PA 19046-5002 ("Property").
2. Creditor has filed Proof of Claim number 6 in the amount of \$202,189.82. This amount includes a pre-petition arrearage in the amount of \$22,519.06.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim, and therefore proposes an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)  
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Attorneys for Creditor

The case attorney for this file is Karina  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A. to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229,  
Philadelphia, PA 19105, ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Andrew R Gross, Sadek and Cooper, 1315 Walnut Street, Suite  
502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on December 16,  
2020:

Andrew R Gross, 325 Peach Tree Drive, Jenkintown, PA 19046

Andrew R Gross, 325 Peachtree Dr, Jenkintown, PA 19046-5002

Wells Fargo Mortgage, P O Box 31557, Billings, MT 59107

DATE: December 16, 2020

/s/ Karina Velter

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